

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER  
ESSENTIALS, INC., ROCKSTAR  
CHAMPIONSHIPS, LLC, JEFF & CRAIG  
CHEER, LLC, d/b/a JEFF AND CRAIG  
CAMPS, and ASHLEY HAYGOOD,  
Individually and on Behalf of all Others  
Similarly Situated,

Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN SPORTS,  
LLC, VARSITY SPIRIT, LLC, STANBURY,  
LLC, HERFF JONES, LLC, BAIN CAPITAL,  
LP, CHARLESBANK CAPITAL  
PARTNERS, LLC, VARSITY BRANDS  
HOLDING CO., INC., VARSITY SPIRIT  
FASHION & SUPPLIES, LLC, U.S. ALL  
STAR FEDERATION, INC., USA  
FEDERATION FOR SPORT CHEERING,  
d/b/a USA CHEER, VARSITY INTROPIA  
TOURS, LLC and JEFF WEBB,

Defendants.

CIVIL ACTION

FILE NUMBER:

2:20-cv-02782-SHL-atc

**MOTION TO APPOINT INTERIM  
LEAD CLASS COUNSEL**

**MOTION**

Pursuant to Fed. R. Civ. P. 23(g)(3), Plaintiffs move to select Robert A. Falanga to act as Interim Lead Class Counsel for the putative classes identified in Plaintiffs' Complaint.

Respectfully submitted,

This 3<sup>rd</sup> day of November, 2020.

s/ Robert A. Falanga

Attorney Bar Number: 254400

Attorney for Plaintiffs and their Putative  
Classes

*Motion for admission pro hac vice forthcoming*

s/ Kobelah Svensen Bennah

Attorney Bar Number: 378113

Attorney for Plaintiffs and their Putative  
Classes

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